

UNITED STATES OF AMERICA
DISTRICT OF RHODE ISLAND

CR 06 42 ML

UNITED STATES OF AMERICA : Criminal No.
:
v. : 26 U.S.C. § 7201
:
NEIL STIERHOFF :

INDICTMENT

COUNT ONE

The Grand Jury charges:

That during the calendar year 1999, the defendant, NEIL STIERHOFF, a resident of Providence, Rhode Island, had and received taxable income in the sum of approximately \$193,246; that upon said taxable income there was owing to the United States of America a substantial income tax; that well knowing and believing the foregoing facts, the defendant NEIL STIERHOFF, on or about April 17, 2000, in the District of Rhode Island, did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year by failing to make an income tax return on or before April 17, 2000, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by committing the following

acts: conducting business under the name of Joseph Adams, using a post office box in the name of Universal Audio to receive business receipts, utilizing a bank account in the name of Joseph Adams in order to deposit his business receipts, and using extensive cash.

In violation of Title 26, United States Code, Section 7201.

COUNT TWO

The Grand Jury further charges:

That during the calendar year 2000, the defendant, NEIL STIERHOFF, a resident of Providence, Rhode Island, had and received taxable income in the sum of approximately \$422,620; that upon said taxable income there was owing to the United States of America a substantial income tax; that well knowing and believing the foregoing facts, the defendant NEIL STIERHOFF, on or about April 16, 2001, in the District of Rhode Island, did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year by failing to make an income tax return on or before April 16, 2001, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue

Service said income tax, and by committing the following acts: conducting business under the name of Joseph Adams, using a post office box in the name of Universal Audio to receive business receipts, utilizing a bank and other financial account in the name of Joseph Adams in order to deposit his business receipts, and using extensive cash.

In violation of Title 26, United States Code, Section 7201.

COUNT THREE

The Grand Jury further charges:

That during the calendar year 2001, the defendant, NEIL STIERHOFF, a resident of Providence, Rhode Island, had and received taxable income in the sum of approximately \$345,967; that upon said taxable income there was owing to the United States of America a substantial income tax; that well knowing and believing the foregoing facts, the defendant NEIL STIERHOFF, on or about April 15, 2002, in the District of Rhode Island, did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 2002, as required by law, to any proper officer of the Internal

Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by committing the following acts: conducting business under the name of Joseph Adams, using a post office box in the name of Universal Audio to receive business receipts, utilizing a bank account and other financial account in the name of Joseph Adams in order to deposit his business receipts, and using extensive cash.

In violation of Title 26, United States Code, Section 7201.

COUNT FOUR

The Grand Jury further charges:

That during the calendar year 2002, the defendant, NEIL STIERHOFF, a resident of Providence, Rhode Island, had and received taxable income in the sum of approximately \$145,006; that upon said taxable income there was owing to the United States of America a substantial income tax; that well knowing and believing the foregoing facts, the defendant NEIL STIERHOFF, on or about April 15, 2003, in the District of Rhode Island, did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 2003, as

required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by committing the following acts: conducting business under the name of Joseph Adams, using a post office box in the name of Universal Audio to receive business receipts, utilizing a bank and other financial account in the name of Joseph Adams in order to deposit his business receipts, and using extensive cash.

In violation of Title 26, United States Code, Section 7201.

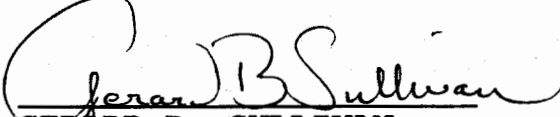
A TRUE BILL: **REDACTED**

Grand Jury Foreperson

ROBERT CLARK CORRENTE
United States Attorney

By: 

JOHN N. KANE
Trial Attorney
U.S. Department of Justice
Tax Division, Northern Criminal Enforcement



GERARD B. SULLIVAN
Chief, Criminal Division

Dated: 3-22-06